

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

Mitchell E. Daniels Jr. Governor

Thomas W. Easterly Commissioner

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May 26, 2009

Mr. Bharat Mathur Acting Regional Administrator U.S. Environmental Protection Agency Region 5 77 West Jackson Blvd. Chicago, Illinois 60604-3590

> Re: Negative Declaration for Fiberglass Boat Manufacturing Materials CTG

Dear Mr. Mathur,

The purpose of this letter is to provide the United States Environmental Protection Agency (U.S. EPA) with a Negative Declaration regarding the need for a regulation governing "Fiberglass Boat Manufacturing Materials" in Lake and Porter counties, Indiana.

On December 4, 2008, the Indiana Department of Environmental Management (IDEM) submitted a "Request for Redesignation and Maintenance Plan for Ozone Attainment in the 8-Hour Ozone Nonattainment Area for Lake and Porter Counties, Indiana; Request for Parallel Processing" to U.S. EPA. Part of this submittal was a demonstration of compliance with requirements pertaining to Reasonably Available Control Measures for volatile organic compounds. IDEM has performed extensive further examination of Control Techniques Guidelines issued through 2008 and is addressing necessary rulemaking to implement those measures.

IDEM has determined that there are no sources (i.e., that construct the molds or "tools" that are used to build the separate parts of fiberglass boats) from this source category in the Indiana portion of the Chicago-Gary-Lake County, Illinois-Indiana nonattainment area made up of Lake and Porter counties.

In order to determine if any of the sources that construct the molds or tools used to build fiberglass boat parts were located within the two county area, the following sources of information were reviewed:

- 1. Indiana does not have any sources in Lake and Porter counties subject to the Boat Manufacturing NESHAP at 40 CFR Part 63, Subpart VVVV.
- 2. The emission inventory database that identifies companies and emission units within the two county area.

- 3. CAATS (Computer Assisted Approval and Tracking System) that identifies companies within the two county area that are registered in IDEM's permitting system.
- 4. The Harris Directory (Harris Infosource) that provides Standard Industrial Classification (SIC) code information. SIC 3732, Boat Building and Repairing, was investigated.
- 5. On the Web, the following business search engines that provide Standard Industrial Classification (SIC) code information:
 - a. Websters Online with over 1,000,000 industrial and commercial companies across the country.
 - b. Manta with over 63,000,000 companies with information on small- and medium-size businesses.

After reviewing all of the above sources of information, Indiana did not find any company fitting the Fiberglass Boat Manufacturing Materials description in the Indiana portion of the Chicago-Gary-Lake County, Illinois-Indiana nonattainment area. IDEM requests that U.S. EPA approve this Negative Declaration for "Fiberglass Boat Manufacturing Materials". If you have any questions, please contact Scott Deloney, Chief, Air Programs Branch at (317) 233-5694.

Sincerely,

Daniel Murray

Assistant Commissioner

Cc: Pat Troth, IDEM
Susan Bem, IDEM
Scott Deloney, IDEM
Cheryl Newton, U.S. EPA
Steve Rosenthal, U.S. EPA